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Attorneys for Defendants
Blue Macaw Mexican Restaurant LLC,
Edmon Haddad and Penny Haddad

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

KIND MACAYO, LLC, an Arizona limited,
 liability company,

Plaintiffs,

vs.

BLUE MACAW MEXICAN RESTAURANT
 LLC, a Nevada limited liability company,
 EDMON HADDAD, an individual, and
 PENNY HADDAD, an individual, and
 MACAYO VEGAS, INC., a Nevada
 Corporation,

Defendants.

) Case No. 2:19-cv-01451-JAD-VCF
)
)

) **STIPULATION AND**
) **ORDER EXTENDING TIME FOR**
) **THE HADDAD DEFENDANTS TO**
) **FILE RESPONSES TO (i) VERIFIED**
) **COMPLAINT, AND (ii) MOTION**
) **FOR PRELIMINARY INJUNCTION**

) **(Second Request)**
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Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiff Kind Macayo, LLC and Defendants Blue Macaw Mexican Restaurant LLC, Edmon Haddad, and Penny Haddad (collectively the “Haddad Defendants”) hereby STIPULATE: (i) to extend the time for the Haddad Defendants to file their response to the Verified Complaint (ECF No. 1); and (ii) to extend the time for the Haddad Defendants to file their response to Plaintiff’s Motion for Preliminary Injunction (ECF No. 4). The Haddad Defendants’ responses to the Verified Complaint are due on September 27, 2019. (See ECF No. 26) (granting first extension request). The Haddad Defendants’ responses to the Motion for Preliminary Injunction are due on

1 September 20. (*Id.*) If approved, the forgoing parties have agreed to an approximate two-week
2 extension of time for the Haddad Defendants to file their responses to the Verified Complaint and
3 the Motion for Preliminary Injunction, respectively. Accordingly, the Haddad Defendants'
4 response to the Verified Complaint would be due on **October 11, 2019**, and their response to the
5 Motion for Preliminary Injunction would be due on **October 4, 2019**. The Haddad Defendants
6 agree that Plaintiff's agreement to the foregoing extension of time shall not be used by them to
7 support any defense or argument based on the doctrine of laches. This is the second stipulation
8 seeking to extend the subject deadlines.

9 The parties submit that good cause exists for approval of the requested extensions as the
10 parties have been engaged in meaningful settlement negotiations to determine whether this case
11 can be promptly settled, and have, in-fact, made substantial progress in their settlement
12 negotiations.
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The parties submit that the short extensions requested herein are not for purposes of delay.

DATED: September 19, 2019

Respectfully submitted,

CAMPBELL & WILLIAMS

By /s/ J. Colby Williams
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Attorneys for Plaintiff
Kind Macayo, LLC

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE
Dated: September 19, 2019.